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LAWRENCE RUIZ, ESQ.
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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SYRIAH REGAINS,

Plaintiff,

vs.

99 CENTS ONLY STORES, LLC. d/b/a 99
CENTS ONLY, a foreign limited liability
company; DOES I-X; and ROE
CORPORATIONS I-X, inclusive,

Defendants.

Case No.: 2:22-cv-00334-JCM-VCF

STIPULATION AND ORDER TO EXTEND DISCOVERY – FIRST REQUEST

COMES NOW Plaintiff, SYRIAH REGAINS, by and through her counsel of record NICKOLAS GIORGIONE, ESQ., of the RUIZ LAW FIRM, and Defendant 99 CENTS ONLY STORES, LLC., by and through their counsel of record LEW BRANDON, JR., ESQ., ANDREW GUZIK, ESQ., and HOMERO GONZALEZ, ESQ., of the BRANDON|SMERBER LAW FIRM, and hereby stipulate and request that this Court extend the current scheduling order and discovery plan in this matter for a period of ninety (90) days for the reasons explained herein.

Pursuant to Local Rule 6-1(b), the parties hereby state this is the first such discovery extension requested in this matter.

DISCOVERY COMPLETED TO DATE

The parties have conducted an FRCP 26(f) conference and have served their respective FRCP 26(a) disclosures;

Defendant has served upon Plaintiff one set of Requests for Production, one set of Interrogatories and one set of Requests for Admissions. Plaintiff has responded to the discovery requests;

Plaintiff has served upon Defendant one set of Requests for Production and one set of Interrogatories. Defendant has yet to respond;

Plaintiff has yet to provide provider specific authorizations;
Defendant set the deposition of the Plaintiff and vacated the same due to Plaintiff's current physical and mental health conditions;

DISCOVERY TO BE COMPLETED AND REASONS

FOR EXTENSION OF DISCOVERY

Discovery to be completed includes:

- Deposition of Plaintiff;
- Depositions of Plaintiff's treating physicians;
- Disclosure of experts by both parties;
- Depositions of expert witnesses and rebuttal expert witnesses;
- Plaintiff to notice Defendant's 30(b)(6) deposition; and

The parties, pursuant to Local Rule 6-1, state that good cause exists for the requested extension. The parties agree that, pending this Court's approval, extension of remaining

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discovery deadlines is appropriate, as Plaintiff recently suffered some physical and mental health issues that have made her unable to participate in the discovery process. The parties have continued to work together amicably, and all discovery to be completed is currently being scheduled pending Plaintiff's recovery from her physical and mental health issues. All other discovery is set to continue to move forward in the interim. Further, the parties still wish to further investigate this case and potentially reach a resolution prior to incurring fees and costs for further extensive discovery and experts once these medical records for pre-incident treatment are received.

[PROPOSED] NEW DISCOVERY DEADLINES

Expert Disclosure Deadline	April 13, 2023
Rebuttal Expert Disclosure Deadline	May 15, 2023
Discovery Cut-Off Date	June 14, 2023
Dispositive Motion Deadline	July 13, 2023
Proposed Joint Pre-Trial Order	August 14, 2023

If this extension is granted, all anticipated additional discovery should be concluded within

If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.

1 the stipulated extended deadline. The parties aver that this request for extension of discovery
2 deadlines is made by the parties in good faith and not for the purpose of delay.

3 APPROVED AS TO FORM AND CONTENT.

4 Dated this 19th day of July, 2022.

Dated this 19th day of July, 2022.

5 RUIZ LAW FIRM

BRANDON|SMERBER LAW FIRM

6 /s/ Nickolas Giorgione

/s/ Homero A. Gonzalez

7 NICKOLAS GIORGIONE, ESQ.

LEW BRANDON, JR., ESQ.

8 Nevada Bar No. 14370

Nevada Bar No. 5880

9 1055 Whitney Ranch Drive, Suite 110

ANDREW GUZIK, ESQ.

10 Henderson, NV 89014

Nevada Bar No. 12758

11 *Attorney for Plaintiff*

HOMERO A. GONZALEZ, ESQ.

Nevada Bar No. 15231

139 E. Warm Springs Road

Las Vegas, NV 89119

Attorneys for Defendant

14 IT IS SO ORDERED:

15 

16 UNITED STATES MAGISTRATE JUDGE

17 Dated: 7-20-2022

18 _____

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Tammy Wagner

From: Homero Gonzalez <H.Gonzalez@bsnv.law>
Sent: Tuesday, July 19, 2022 11:30 AM
To: Tammy Wagner
Cc: Nick Giorgione
Subject: RE: Regains v. 99 Cents Only
Attachments: Stip and Order to Extend.1st.revised.pdf

Good morning:

You may affix my signature to the attached version of the Stipulation and Order to Extend Discovery Deadlines. Thank you.

Warmest regards,
HOMERO A. GONZALEZ, ESQ.
ASSOCIATE ATTORNEY
BRANDON | SMERBER LAW FIRM
139 EAST WARM SPRINGS ROAD
LAS VEGAS, NEVADA 89119
TEL. (702) 380-0007
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From: Tammy Wagner <Tammy@lmruizlaw.com>
Sent: Tuesday, July 19, 2022 11:28 AM
To: Homero Gonzalez <H.Gonzalez@bsnv.law>
Cc: Nick Giorgione <nick@lmruizlaw.com>
Subject: RE: Regains v. 99 Cents Only

Mr. Gonzalez,

Please find attached the revised Stip and Order.

Thank you,

Tammy A. Wagner, ACP
Advanced Certified Paralegal/Office Administrator



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